

October 11, 2021

The Honorable Ronnie Abrams
United States District Court for the Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *In Re Petition of Marginalised Affected Property Owners*, No. 1:21-mc-00681

Dear Judge Abrams,

I represent Petitioner Marginalised Affected Property Owners (MAPO) in connection with the above-referenced petition, which requests discovery from Respondents BSG Resources Limited (BSGR), Alvarez & Marsal Holdings, LLC (A&M), and Cleary Gottlieb Steen and Hamilton LLP (Cleary) pursuant to 28 U.S.C. § 1782 in connection with a proceeding in Sierra Leone. In accordance with Paragraphs D and E of Your Honor's Individual Rules, I write to request that the Court stay the Petition in accordance with the parties' agreement.

Petitioner MAPO filed this Application on August 19, 2021. ECF 1. On September 21st, MAPO notified the Court that it wished to withdraw its petition against Respondent A&M, and requested that the Court enter a stipulated scheduling order. ECF 9. The Court entered the proposed order on September 27, 2021. ECF 10.

Counsel have further met and conferred with counsel for Respondent Cleary and counsel for the Joint Administrators of Respondent BSGR. The Joint Administrators of Respondent BSGR have voluntarily produced the discovery the Petition requested. Accordingly, the parties request that this Court stay the Petition while the parties confer about the confidentiality of the documents.

Counsel for all parties have discussed and stipulated to this stay. MAPO has circulated this letter motion to all counsel and received the parties' consent to file it.


We thank the Court for its consideration.

Respectfully submitted,

/s/ Lindsay Bailey
Lindsay Bailey
EarthRights International
1612 K Street NW, Suite 800
Washington, DC 20006
Tel: 202-466-5188 x 120
lindsay@earthrights.org
Counsel for Petitioner

Application granted.

SO ORDERED.



Hon. Ronnie Abrams
10/12/21

Cc: All Counsel of Record (via ECF)